

October 20, 2006

Song Her, Clerk to the Board State Water Resources Control Board 1001 I Street, Sacramento California, 95814



Subject: Comment Letter - Federal CWA Section 303(d) List

This letter is to provide technical support for the letter previously sent by the City of Rancho Palos Verdes regarding removing bacteria related impairments for the beaches along the City of Rancho Palos Verdes, and in fact all of the beaches along the Palos Verdes Peninsula.

Attached is a preliminary summary of recent testing results. As you can see, and as indicated in Rancho Palo Verdes' letter, the test result show bacterial impairment levels well below the delisting criteria as approved in the 2004 guideline. For example (using total coliform):

Sample Period	Number of samples	Exceedances	Delisting Criteria*
Dry Weather	1,303	0	Less than 19
Summer 2005	1		exeedances per
			116-121 samples
Dry Weather	757	0	same
Winter 05-06			
Wet Weather	218	1	same
Winter 05-06			

*Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List, State Water Resources Control Board 2004

The TMDL related monitoring for the Palos Verdes Peninsula beaches began in November of 2004, and during the initial season, the sample results were higher, but this was due to the near record storms which occured that year. Those results are included in the attached summary of results.

The currently 303(d) listed waterbodies that should be delisted for bacteria related impairments are:

13310 FIRESTONE BLVD.A-2 SANTA FE SPRINGS CALIFORNIA 90670 (562) 802-7880 FAX (562) 802-2297

GENERAL ENGINEERING LICENSE A-582340

HAZARDOUS SUBSTANCE REMEDIATION LIC. 3382 Abalone Cove Beach,
Bluff Cove Beach,
Cabrillo Beach (outer),
Flat Rock Point Beach area
Inspiration Point Beach
Lunada Bay Beach,
Malaga Cove Beach,
Long Point Beach,
Palo Verde Shoreline Park Beach,
Point Fermin Park Beach,
Point Vicente Beach,
Portuguese Bend Beach, and
Royal Palms Beach.

Please call me at 562-802-7880 extension 25 if you have any comments or need additional information. Thank you for your consideration of this matter.

Sincerely,

John L. Hunter

President

EXCEEDENCES AT SHORE STATIONS: PRELIMINARY SUMMER 2006

DRY WEATHER

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MONTH	SN	B-7-1-(S	M)	SM	1B-7-2 (S	SB)	SI	MB-7-3 (S1)	SM	B-7-4 (S	2 D)	S	MB-7-5 (S3)	SI	MB-7-6 (S5)		SMB-7-7	7 -	SI	MB-7-8 (S6)	, s	MB-7-9 (37)
	TOTAL COLIFORMS	FECAL COLIFORMS	ENTERDOCOCCUM	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUE	TOTAL COLFORMS	FECAL COLIFORMS	ENTEROCOCCUI	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUM	TOTAL COLIFORMS	FECAL COLFORMS	BITTEROCOCYTU	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS	TOTAL COLIFORMS	FECAL COLIFORNIS	BHTEROCOCCUS	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS	TOTAL COLFORMS	FECAL COLFORMS	ENTEROCOCCUE
APRIL	0 2	0 2	0 2	0 2	0 2	0 2	0 16	0 2	0-2	0 16	0 2	0 2	.0 16	0 2	0_2	0 16	0 2	0 2	0 2	0 2	0 2	0 16	0 2	0 2	0 16	0 2	0 2
MAY	0 4	0 4	0 4	0 4	0 4	0 4	0 28	0 0	0 4	0 28	0 0	0 4	0 28	0 0	0 4	0 28	0 0	0 4	0 4	0 4	0 4	0 28	0 0	0 4	0 28	ŌŌ	0 4
JUNE	0 4	0 4	0 5	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	0 4	1 5	0 5
JULY	.0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	0 5	1 5	0 5	0 5	0 5	0 5	0 5	0 5
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SEPTEMBER																											
OCTOBER									- 1	<u> </u>	<u> </u>									L							
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WET WEATHER

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	TOTAL COLIFORMS	FECAL COLIFORMS	ентиносоския	TOTAL COLIFORMS	FECAL COLFORMS	ENTEROCOCCUE	TOTAL COLFORMS	FECAL COLFORMS	ENTEROCOCOUS	TOTAL COLIFORMS	FECAL COLIFORMS	DITURGEOCCU	TOTAL COLFORMS	FECAL COLFORMS	ENTERNATION	TOTAL COLIFORMS	FECAL COLFORMS	DITEROCOCCUE	TOTAL COLFORMS	FECAL COLFORMS	ENTEROCOCCUM	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS	TOTAL COLFORMS	FECAL COLIFORNIS	ENTENDEDCOME
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EXCEEDENCES AT SHORE STATIONS: PRELIMINARY WINTER 2005-2006

DRY WEATHER

		-											STATION													
MONTH	SMB-7-1 (SM) -	SMB	-7-2 (S	B)	SN	IB-7-3 (31).	SM	B-7-4 (S	2 D)	. SI	/B-7-5 (S	3)	SM	MB-7-6 (S	5)	1	SMB-7-7	がさ	SA	AB-7-8 (\$		SI	/В 7-9 (S	\$ 7).
	TOTAL FECAL-E	TO DROCCOCLS COLIF	TAL FORMS CO	FECAL OLIFORMS	ENTE HOCOCCUS				TOTAL, COLIFORMS	FECAL COLIFORMS	ENTERDOCCUS	TOTAL COLFORMS		ENTERCOCCCUS	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS	TOTAL COLFORMS	COUFORMS	ENTERCOCCUS	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUR	COUFORMS	E COLFORNIS	ENTEROCOCCUS
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Dry Weather Summary

Exceedences for enterococcus occurred at stations SMB-7-6 and SMB-7-9.

WET WEATHER ...

											STATION	٧											
MONTH	SMB 7:1 (SM)	SMB-7-2	(SB)	a. Si	1B-7-3 (S	(1)	, SM	B-7-4 (S	2 D)	Ŝ	MB-7-5 (S	S3)	SA	/B-7-6 (S	55)	7-2-50	SMB-7-7		SM	B-7-8 (S	56)	SMB-Q	9(S7) -
,		TOTAL FECAL COLIFORM	IS ENTERIORICAL	. €072 €01 €875	(ESA) (CO) (CO)	NIERO COCCUE	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS	COLIFORNIS	(FEEAL).** COLFORNS	STUDENCE OF	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS	COLFORUS	COLFORMS	resconding of	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS	din a	
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JANUARY	0.7 -0.7 0.7	0 1 0 1	0 1		0.0		0 7	0 1	0 1	01-7	0.7	** **********************************	0 7	0 1	9 1	0 7	0	0 1	0 7	0 1	0 1	0.7	
FEBRUARY	0,1 0.1 0.1	0 1 0 1	0 1	0 5	0.72	0-1	0 5	0 1	0 1	r Öiriöi	0.0	0.1-	0 5	0 1	0 1	0.0	0 ⊅	0/2	0 5	0 1	0 1	0.8 0	T 0=1
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Wet Weather Summary

Exceedences for enterococcus occurred at stations SMB-7-5, SMB-7-6, and SMB-7-9. An exceedence for total coliforms occurred at SMB-7-3.

EXCEEDENCES AT SHORE STATIONS: PRELIMINARY SUMMER 2005

DRY WEATHER

														STATIO	4												
MONTH	SA	/B-7-1 (S	SM)	S	MB-7-2 (SB)	S	MB-7-3 (S1)	SM	B-7-4 (S	2 D)	SI	MB-7-5 (53)	SI	MB-7-6 (S5)		SMB-7-	7, .	SI	MB-7-8 (56)	SI	MB-7-9 (S7)
	TOTAL COLIFORMS	FECAL COLFORMS	PCISECOCCUS	TOTAL COLFORMS	FECAL COLIFORMS	DALEWOODCOR	TOTAL COLFORMS	FECAL COLIFORNIS	BYTEROCOCCUS	TOTAL COLFORMS	FECAL COLIFORMS	EMTEROCOCCUS	TOTAL COLIFORNS	FECAL COLIFORNIS	BITTERCOCCUL	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS	, TUTAL COLFORMS	FECAL COLIFORMS	ENTEROCOCCUS	TOTAL COLIFORMS	FECAL COLIFORMS	Untraccoccus	TOTAL COLIFORMS	FECAL COLFORMS	EMTEROCOCCUS
APRIL	0 5	0 5	0 5	0 5	0 5	0 5	0 27	0 5	0 5	0 27	0 5	0 5	0, 27	0 5	0 10	0 27	0 6	1 6	0 5	0 5	0 5	0 27	0 5	0 5	0 27	0 5	5 0
MAY	0 5	0 5	0 5	0 5	0 5	0 5	0 31	0 5	0 5	0 31	0 5	0 5	0 31	0 5	0.5	0 31	0 5	0 5	0 4	0 4	0 4	0 31	0 5	0 5	0 31	0 5	0 5
JUNE	0 5	0 5	0 5	0 5	0 5	0 5	0 30	0 6	0 5	0 30	0 6	0 5	0 30	0 6	0 5	0 30	0 6	0 5	0 4	0 4	0 4	0 30	0 6	0 5	0 30	0 6	0 5
JULY	0 5	0 5	0 5	0 5	0 5	0 5	0 31	0 5	0 5	0 31	0 5	1 5	0 31	0 5	0 5	0 31	0 5	0 5	0 5	0 5	0 5	0 31	0 5	0 5	0 31	0 5	0 5
AUGUST	0 5	0 5	0 5	0 5	0 5	0 5	0 31	0 5	0 5	0 31	0 5	0 5	0 31	0 5	0.5	0 31	0 5	0 5	0 5	0 5	0 5	0 31	0 5	.0 5	0 31	0 5	0 5
SEPTEMBER	0 4	0.4	0 4	0 4	0 4	0 4	0 25	0 4	0 4	0 25	0 4	0 4	0 25	0 4	0 4	. 0 25	0 4	0 4	0 4	0 4	, 0 4	0 25	0 4	0 4	0 25	0 4	0 4
OCTOBER	0 4	0 4	0 4	0 4	0 4	0 4	. 0. 26	0.4	0 4	0 26	0 4	0 4	0 26	0 4	0 4	0 26	0 4	0 4	0 4	0 4	0 4	0 26	0 4	0 4	0 26	0.4	0 4
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Dry Weather Summary

Exceedences for enterococcus occurred at stations SMB-7-4, SMB-7-6, and SMB-7-9.

WET WEATHER

														STATIO	V				_								
монтн	SM	/B-7-1 (S	M)	SI	MB-7-2 (SB)	SI	MB-7-3 (S1)	SM	B-7-4 (S	2 D)	S	MB-7-5 (S3)	S	MB-7-6 (S5)		SMB-7-7	7	SI	MB-7-8 (56)	· si	MB-7-9 (S7)
	TOTAL COLFORMS	FECAL COLIFORMS	ENTEROCOCCUS	TOTAL COLIFORMS	FECAL COLFORMS	ENTEROCOCCUS	TOTAL COLFORMS	FECAL COUFORMS	IMPEROCOCCU	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUM	TOTAL COLFORAS	FECAL COLIFORMS	E-TEMPOCOCCUS	TOTAL COLIFORMS	FECAL COLFORMS	ENTEROCOCCUS	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS	TOTAL COLIFORMS	FECAL COLIFORMS	ENTERACOCCUS	, TOTAL COLFORMS	TECAL COLFORNIS	DITTE ACCORDING
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JUNE	0 0	0 0	. O O.	0 0	0 0	0 0	0 0	0 0	0 0	0.0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0-0	0 0	0 0	0 0	0 0	0 0	0 0
JULY	0 0	. 0 0	ÒÓ	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	00	0 0	0 0	0 0	0 0	0.0	0 0
AUGUST	0 0	0.0	0 0	0 0	0.0	-0-0	00,	0 0	0 0	0 0	0 0	0 0	0 0	0_0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	, 0 0	0 0	0 0
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Wet Weather Summary

Exceedences for enterococcus occurred at stations SMB-7-2, SMB-7-3, SMB-7-4, SMB-7-6, SMB-7-7, and SMB-7-9. An exceedence for fecal coliforms occurred at SMB-7-3.

EXCEEDENCES AT SHORE STATIONS: PRELIMINARY WINTER 2004-2005

DRY WEATHER

														STATION													
MONTH	SM	B-7-1 (S	M)	SM	IB-7-2 (S	SB)	ŝı	MB-73 (\$1)	SM	B-7-4 (S	2 D)	∕∵ુs।	MB-7-5 (S	3)	SM	/B-7-6 (S	55)	A 45 276	SMB-7-7.	ik in	SN	ИВ-7-8 (S		A. SA	B-7-9 (57)
		FECAL	district.	TOTAL COLIFORMS	FECAL COLIFORMS	ENTERPOCOCCUS	TOTAL COLIFORMS	FECAL COLIFORMS	exitencescare	TOTAL COLFORMS	FECAL COLIFORMS	EMTEROCOCCUS	# TOTALS COLFORMS	COLFORMS	CYTTLEOCOCCUS	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS		COUFORMS		TOTAL LIFORMS	FECAL COLIFORMS	ENTERNOCOCCUS	COLIFORMS	FECAL COLFORMS	ENTEROCOCCUS
NOVEMBER	0: 4-	0.4	0.4	0 4	0 4	0 4	4 0 · 26	0.4	0 4	0 26	0 4	0 4	0 26	و4. 0 ج	0.4	0 26	0 17	B 26	0 4	±0=4-	0 4	0 26	0 13	0 4	10126	01 26	2 0 4
DECEMBER	0.3.	0,3	.0x-3	0 4	0 4	1 4	0 20	-0-3	0.3	0 20	0 3	0 3.	0.20	0.93	10 TO	0 20	0 20	. 3 20	0 3	0.3	Marin 1971	0 20	0 20	2 16	0 20	0.4	*0: 3 *0: 3
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FEBRUARY	0.2	0:12	02 2	0 2	0 2	0 2	70713	10 2	0.12	0 13	0 2	0 2	0 10	0.2	0.42	0 13	0 10	1 12	* 0 * 43	0.3	att nets	0 13	0 13	0 2	0_13	0 2	* 0: .2
MARCH	0.4		0 4	0 4	0 4	0 4	0 23	0 K	0.4	0 23	0 4	0 4	20 23	0 4	3.15	0 23	0 4	0 4	0.4	0-4	0,≈4	0 23	0 21	0 4	0 23	0.4	0.4
TOTAL	0 16	0.416	0 16	0 17	0 17	ी 17	0 196	0.00	0-16	0 96	0 16	0 16	0.98	£0≥16	3e-27	0 96	0 65	10 76	0 77	0.00	0 17	0 96	0 81	2 32	€0 €96	0 39	0 18
PERCENT	0.4	10	0	0	0	6			¥0.4		0	0	0	0	11	0	0	13	0 ₋₈	\$:0@ ¥	00	0	0	6	0	-0	Ō.

Dry Weather Summary

Exceedences for enterococcus occurred at stations SMB-7-2, SMB-7-5, SMB-7-6, and SMB-7-8.

WET WEATHER

	l -		-											STATION													
монтн	SME	7:1 (5	M)	SN	AB-7-2 (SB)	S	MB=7=3(Si) :	SN	B-7-4 (S	2 D)	-Şî	/B:7-5 (S	3) .	SI	/B-7-6 (S	55)		SMB-7-7	-	_ SI	AB-7-8 (S6)	± SN	B=749(S	U)
	COUFORMS C	(FECAL OLIFORMS	WI DOCUMENT	TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUS	COLFORUS	(TEC)	ENTEROCOCCUES	TOTAL COLFORNS	FECAL COLIFORMS	ENTERNOCOCCUS	COMM COMM	GEOTTE GOLDEN		TOTAL COLIFORMS	FECAL COLIFORMS	ENTEROCOCCUE	Chrone Micr	(EE)/\(\)	sul Const	TOTAL COLIFORMS	FECAL COLIFORMS	ENLEWCOCCOR	(IOIA) COLFORAS	COLFORNS	TIDEO COM
NOVEMBER	Q 9	0.0	ىلى 0.	0 1	0 1	0 1	20 O	0,0	0.0	0 4	0 1	0 1	0.0	0-1	0.7	0 4	1 4	1 4	*0. <i>0</i>	0,0	0.0	0 4	0 4	0 1	∂ 0 Ø	∙0°⊘	0.0
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PERCENT	00	00	33 (11	0	22	200	00	an.	5	0	33	2	0	19.	4	8	59	- 0	0	68)	7	5	46	Q	0	44

Wet Weather Summary

Exceedences for enterococcus occurred at all stations. Exceedences for total coliforms occurred at all stations except SMB-7-7.

Exceedences for fecal coliforms occurred at SMB-7-1, SMB-7-3, SMB-7-6, and SMB-7-8.